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VIA ECF

November 22, 2019

Hon. Peggy Kuo United States Magistrate Judge United States District Court, Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Miller, et al. v. Arab Bank, PLC, 18-cv-2192 (BMC)(PK)

Pam, et al. v. Arab Bank, PLC, 18-cv-4670 (BMC)(PK)

Requested Extension of Deadline for Interrogatory Responses

Dear Judge Kuo:

We write on behalf of all Plaintiffs in the above-referenced matters to request an extension of the November 22, 2019 deadline set forth in Your Honor's Order of August 23, 2019 for service of the individual objections and responses to Defendant's First Set of Interrogatories. This is the second request for an extension of this deadline. The *Miller* Plaintiffs will have completed and served individual interrogatory objections and responses for at least 31 of their 35 Plaintiffs before the November 22, 2019 deadline, they may need additional time for the remaining 4 Plaintiffs. While the *Pam* Plaintiffs anticipate completing and serving individual interrogatory objections and responses for 7 of their 37 Plaintiffs before the November 22, 2019 deadline, some objections and responses remain incomplete because of difficulties coordinating with Plaintiffs, many who reside in Israel. Plaintiffs therefore request an additional extension of thirty days, until December 23, 2019, for these remaining Plaintiffs to respond to the interrogatories.

Plaintiffs have already served their collective objections and responses to Defendant's interrogatories on September 3, 2019.

Counsel for the Defendant have advised us that they do not oppose the foregoing proposals.

We thank the Court for its consideration.

Respectfully submitted,

Noel J. Nudelman

cc: All Counsel